

**MOTION TO WITHDRAW AS COUNSEL**

1. On April 3, 2019, I entered my appearance as counsel to Carku Technology, LLC, in the above matter.
2. On August 26, 2019, I was informed by the insurance carrier that had retained my firm to defend Carku Technology, LLC that the applicable insurance policy does not provide coverage for that entity.
3. As such, I have been asked to discontinue my representation of Carku Technology, LLC in this matter.
4. Upon information and belief, Carku Technology, LLC is dissolved and no longer in business.

5. My other client in this matter, Shenzhen Carku Technology Co., Ltd., is a Chinese company with its principal place of business located in China.
6. Upon commencement of the litigation relative to the “Carku” defendants, we were informed, by the insurance carrier representative, that Shenzhen Carku Technology Co., Ltd. and Carku Technology, LLC were both covered under the applicable insurance policy.
7. After entering our appearance on behalf of both “Carku” defendants, we began our investigation into the claims made by Plaintiffs.
8. During our investigation, we were able to contact a representative for Shenzhen Carku Technology Co., Ltd., who provided background information about the company.
9. However, due to language barriers, time difference, and other challenges, we did not come to realize that Shenzhen Carku Technology Co., Ltd. had no business relationship with Carku Technology, LLC, until after we had entered our appearance on behalf of Carku Technology, LLC. *See* Declaration of Michael Zhang at ¶3 attached as Exhibit A.
10. The representative for Shenzhen Carku Technology Co., Ltd. further informed us that it was his belief that Carku Technology, LLC was dissolved and no longer in business. *See* Declaration of Michael Zhang at ¶3 attached as Exhibit A.
11. Upon further investigation, we discovered the Carku Technology, LLC is in fact dissolved. *See* Public Records Showing Dissolution of Carku Technology, LLC attached as Exhibit B.
12. As of this date, and after diligent efforts and investigation, I have not been able to contact any representative who could answer on behalf of Carku Technology, LLC.

13. Having had no contact with a representative of Carku Technology, LLC makes it impossible to defend Carku Technology, LLC.
14. Further, having no contact with a representative of Carku Technology, LLC makes it impossible to carry out my ethical obligations as an attorney of the Commonwealth of Pennsylvania.
15. Upon information and belief, Carku Technology, LLC is dissolved and no longer in business, and therefore will not be prejudiced by my withdrawal as counsel in this matter.
16. Pursuant to Western District of Pennsylvania Local Rule 83.2(c), leave of Court is required for counsel to withdraw her appearance.

WHEREFORE, I respectfully request that this Court grant my motion to withdraw as counsel and execute the attached order.

**MARKS, O'NEILL, O'BRIEN,  
DOHERTY & KELLY, P.C.**

By: /s/ Sarah C. Boehme  
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Technology, LTD and Carku Technology, LLC*

**CERTIFICATE OF SERVICE**

This is to certify that on the 23rd day of August, 2019, the foregoing document was electronically filed with the Clerk of the United States District Court for the Western District of Pennsylvania, using the CM/ECF system, which will send notification of such filing to all counsel of records. This document was filed electronically and is available for viewing and downloading from the ECF system.

**MARKS, O'NEILL, O'BRIEN,  
DOHERTY & KELLY, P.C.**

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